

Return Date: \_\_\_\_\_

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re:

Emmanuel Loncke,

Case No. **20-42261-nhl**  
Chapter

Debtor(s)  
-----X

\_\_\_\_\_,  
Plaintiff(s),

Adv. Proc. No. **20-1105-nhl**

-against-

PayPal,

Defendant(s).  
-----X

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the annexed application of

Adversary Proceeding, a hearing will be held before the Hon.

Lord, Bankruptcy Judge, to consider the motion for an Order  
granting relief as follows:

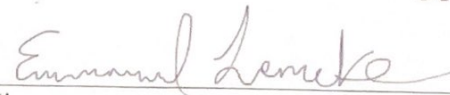
Requesting that the court enters a default judgement against the defendant  
\_\_\_\_\_  
\_\_\_\_\_

Date and time of hearing: February 18, 2021. 10:30am

Location: U.S. Bankruptcy Court

 Telecommunications hearing  
call in and use the code  
1(888) 363-4734  
Code 4702754

Dated: 01/27/21

  
\_\_\_\_\_  
Signature  
Print name: Emmanuel Loncke  
Address: 350 beach 75th st  
Arverne NY 11692  
Phone: 404-993-3479  
Email: Excel\_emt@yahoo.com

Case 1-20-01105-nhl Doc 12 Filed 03/25/21 Entered 03/25/21 12:56:09

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re:

Emmanuel Loncke,

Case No. 20-42261-nhl  
Chapter 7

Debtor(s)  
-----X

\_\_\_\_\_,  
Plaintiff(s),

Adv. Proc. No. 20-1105-nhl

-against-

PayPal loan builder,

Defendant(s).  
-----X

APPLICATION IN SUPPORT OF MOTION

TO THE HON. \_\_\_\_\_ Lord \_\_\_\_\_, Bankruptcy Judge

I, Emmanuel Loncke, Plaintiff, make this application in support of my motion for the following relief:

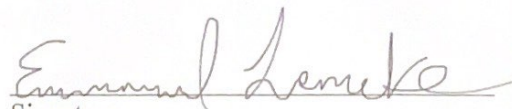
\$25,000 from PayPal Loan Builder in punitive damages and \$25,000 for compensatory damages for collect debts from the debtor account causing mental and financial stress while disregarding the bankruptcy law

In support of this motion, I hereby allege as follows:

I made multiple attempts to contact PayPal Loan Builder to inform them that I was going through bankruptcy and also to stop taking payments while in process June 2020. There was multiple deductions made even after contact was made June 4th, 18th and 29th from a Wells Fargo Account total \$623.55. No money was return even after contacting the call center. I am seeking relief because this situation cause emotional distress because I was not employed at the time and it was trying to make sure that my family's basic needs were met.

Wherefore, movant prays for an Order granting the relief requested.

Dated: 01/27/21

  
Signature



UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re:

Emmanuel loncke,

Case No. 20-42261-nhl  
Chapter 7

Debtor(s)  
-----X

\_\_\_\_\_,  
Plaintiff(s),

Adv. Proc. No. 20-1105-nhl

-against-

PayPal loan builder,

Defendant(s).  
-----X

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 27, 2021, a copy of the annexed Motion was served by depositing same, enclosed in a properly addressed postage-paid envelope, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York, upon *[below specify the name and mailing address of each party served]*:

Attn: President  
PayPal Loan Builder  
3505 Silverside rd  
Wilmington DE 19810

Dated: 01/27/21

Emmanuel Loncke  
Signature

To whom it may concern,

I Emmanuel Loncke is seeking punitive damages because there willful disregard for the federal bankruptcy law and compensatory damages for the money they took from me during the pandemic. I am requesting \$50,000 from Kabbadge and \$50,000 from PayPal to cover both damages totaling \$100,000. This was extremely stressful for me and my family not knowing how we were going to survive without any form of income coming in our household. I suffered financially because I was not able to take care of my family basic needs such as food and rent during the pandemic which stressed my mental capacity to perform everyday duties needed for my children to learn in an at home environment.

This can with constant headaches ,high blood pressure and weight loss during the bankruptcy. I have tried various ways to reach out to Kabbadge and PayPal through various forms of email/phone calls. No response was given and the funds that were taken from my accounts was never returned. I could not understand why even with me sending letters or adversary to them on multiple accounts that they wouldn't acknowledge the fact that they were in fault to return the money that they took but still no response. I will continue to seek counseling to try to get over the mental anguish that this situation has caused but I really don't know if I will ever be able to recover.